

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MARTHILDE BRZYCKI,
Plaintiff,

v.

HARBORVIEW MEDICAL CENTER
and UNIVERSITY OF
WASHINGTON,
Defendants

Cause No.: 2:18-cv-01582-MJP

DECLARATION OF REBA WEISS IN
SUPPORT OF STIPULATED
MOTION TO PERMIT HER
WITHDRAWAL AS COUNSEL ON
BEHALF OF PLAINTIFF BRZYCKI

NOTE ON MOTION CALENDAR:
September 21, 2020

Reba Weiss declares under penalty of perjury under the laws of the State of
Washington as follows:

1. I am over the age of eighteen and competent to testify in a court of law.
2. I was retained by Plaintiff Brzycki three days ago, on September 18, 2020. I filed my Notice of Appearance on the same day. My intent in filing my Notice of Appearance quickly was to give the Court and opposing counsel prompt notice that Plaintiff, who had been *pro se*, had retained counsel. Unfortunately, in doing so I failed to first determine the complexity of Plaintiff's case and the extent of discovery that had already been conducted.

WEISS DECLARATION IN SUPPORT OF MOTION
TO WITHDRAW AS COUNSEL FOR PLAINTIFF
2:18-cv-01582-MJP

REBA WEISS, ESQ.
WEISS LAW FIRM PLLC
1022 NE 94th Street
Seattle, WA 98115
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3. Once I received the discovery and related documents, I immediately knew that the case was far more complex than I had realized or anticipated prior to filing my Notice of Appearance. There have been at least a dozen depositions conducted and I estimate there to be hundreds of thousands of pages of discovery and other documents in the case.
4. As a sole practitioner without any staff or associates, I simply do not have the capacity to effectively represent Plaintiff in a case as complex and voluminous as hers. To properly represent Plaintiff, I would need to hire an assistant and another attorney, which I cannot afford to do.
5. I have made efforts to assist Plaintiff in finding new counsel. Plaintiff has indicated that, under these circumstances, she has no objection to my withdrawal.
6. In addition, I have plans to move my home of eight years next month.
7. As I only appeared in the case three days ago, I believe there is no prejudice to either party or the Court in granting this motion.
8. I have served a copy of this motion upon Defendants and Plaintiff Brzycki.

Dated this 21st day of September 2020 at Seattle, Washington.



Reba Weiss